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CLS NEVADA, LLC, d/b/a
CLS TRANSPORTATION LAS VEGAS

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

10 THEODORE TRAPP, on his own behalf and
on behalf of all others similarly situated,

CASE NO. 2:09-cv-00995

11 Plaintiff,

12 | VS.

13 BIG POPPA'S, LLC, a Nevada limited
liability company d/b/a BADDA BING
14 MEN'S CLUB; SKY TOP VENDING, INC.,
a Nevada Corporation d/b/a CAN CAN
15 ROOM; LA FUENTE, INC., a Nevada
corporation d/b/a CHEETAS'S; C.P. FOOD
16 AND BEVERAGE, INC., a Nevada
corporation d/b/a CLUB PARADISE; DÉJÀ
17 VU SHOWGIRLS OF LAS VEGAS, LLC, a
Nevada limited liability company d/b/a DÉJÀ
18 VU SHOWGIRLS; PALOMINO CLUB,
INC., a Nevada corporation d/b/a PALOMINO
19 CLUB; SHAC, LLC, a Nevada limited
liability company d/b/a SAPPHIRE; K-KEL,
20 INC., a Nevada corporation d/b/a
SPEARMINT RHINO; D2801 WESTWOOD,
21 INC., a Nevada corporation d/b/a
TREASURES; LITTLE DARLINGS OF LAS
22 VEGAS, LLC, a Nevada limited liability
company d/b/a LITTLE DARLINGS; O.G.
23 ELIADES, A.D., LLC, a Nevada limited
liability company d/b/a OLYMPIC
24 GARDENS; LAS VEGAS
ENTERTAINMENT, a Nevada limited
25 liability company d/b/a LARRY FLYNT'S
HUSTLER CLUB; MICHAEL A. SALTMAN
26 d/b/a MINXX; RICK'S LAS VEGAS; FRIAS
MANAGEMENT, LLC, a Nevada limited
27 liability company d/b/a ACE CAB
COMPANY and A-NORTH LAS VEGAS
28 CAB; WESTERN CAB COMPANY, a

DEMAND FOR SECURITY OF COSTS

Date of Hearing: N/A
Time of Hearing: N/A

1 Nevada corporation d/b/a WESTERN CAB
2 COMPANY and WESTERN LIMOUSINE;
3 NEVADA CHECKER CAB
4 CORPORATION, a Nevada corporation d/b/a
5 CHECKER CAB COMPANY; NEVADA
6 STAR CAB CORPORATION, a Nevada
7 corporation d/b/a STAR CAB COMPANY;
8 NEVADA YELLOW CAB CORPORATION,
9 a Nevada corporation d/b/a YELLOW CAB
10 COMPANY; LUCKY CAB COMPANY OF
11 NEVADA, a Nevada corporation d/b/a
12 LUCKY TRANS; SUN CAB, INC., a Nevada
13 corporation d/b/a NELLIS CAB COMPANY;
14 CLS NEVADA, LLC, a Nevada limited
liability company d/b/a CLS
TRANSPORTATION LAS VEGAS; ON
DEMAND SEDAN SERVICES, LLC, a
Nevada limited liability company d/b/a ODS
LIMOUSINE and ODS CHAUFFEURED
TRANSPORTATION; BLS LIMOUSINE
SERVE OF LAS VEGAS; DESERT CAB,
INC. a Nevada corporation d/b/a DESERT
CAB COMPANY and ODYSSEY
LIMOUSINE; BELL TRANS A NEVADA
CORPORATION, a Nevada corporation d/b/a
BELL TRANS; TONY CHONG, and
individual; and DOE EMPLOYEES 1-1000;

15 Defendants.

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17 TO: THEODORE TRAPP, Plaintiff; and
18 TO: JAY EDELSON, ESQ., RAFEY S. BALABANIAN, ESQ., and JAMES E. SMYTH,
19 ESQ., Attorneys for Plaintiff;

20 Pursuant to NRS 18.130, CLS NEVADA, LLC d/b/a CLS TRANSPORTATION LAS
21 VEGAS hereby makes demand upon Plaintiff, who resides out of State, for security in the amount of
22 Five Hundred and No/100 Dollars (\$500.00) for costs and charges which may be awarded herein
23 against Plaintiff. The requirements of NRS 18.130 apply to actions in the United States District Court,

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1 District of Nevada. Truck Ins. Exchange, 683 F. Supp. 223, 227-28 (D. Nev. 1988); Hamar v.
2 Hyatt Corp., 98 F.R.D. 305, 305-06 (D. Nev. 1983).

3 Dated this 13 day of June, 2009.

4 COOPER LEVENSON APRIL
5 NIEDELMAN & WAGENHEIM, P.A.
6

7 By


8

9 Kimberly Maxson-Rushton
10 Nevada Bar No. 005065
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13 Attorneys for Defendant
14 CLS NEVADA, LLC, d/b/a
15 CLS TRANSPORTATION LAS VEGAS
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CERTIFICATE OF SERVICE

Pursuant to FRCP 5 (b), I certify that I am an employee of COOPER LEVENSER APRIL NIEDELMAN & WAGENHEIM P.A. and that on this 24th day of June, 2009, I did cause a true copy of the foregoing **DEMAND FOR SECURITY OF COSTS** to be served via CM/ECF electronic filing upon the following person(s).

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By Ashley Erakine
An Employee of
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